

IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI

IN RE: Noble Health Real Estate LLC)
)
)
 Debtors.) Case No. 23-20051
)

OBJECTION TO CLAIM

Comes now Movant, Noble Health Real Estate LLC, and hereby objects to the Proof of Claim filed by creditor, United States Department of Labor - Wage Hour, in the amount of \$ 614,021.54, and was filed on 09/22/2023. The court claim number is 39.

Your claim may be reduced, modified, or eliminated. You should read this document carefully and discuss it with your attorney, if you have one.

Pursuant to Local Rule 3007-1 (C), the Claimant shall have 30 days after service of the Objection in which to file a Response, if you do not want the court to eliminate or change your claim. The Response shall be in writing and state why the claim should be allowed as filed. If a Response is filed, the Court will schedule a hearing. If no timely Response is filed, the Court will enter an Order sustaining the Objection to the Claim. Parties not represented by an attorney shall mail a Response to the Court at **U.S. Bankruptcy Court, 400 E. 9th St., Room 1510, Kansas City, MO 64106**. Debtor(s) not represented by an attorney must be served a copy of the Response by regular mail. If your Response is mailed, it must be early enough so that the court will receive it on or before 30 days after service of the Objection.

The basis for the objection is as follows: (PLEASE CHECK ONLY THE APPLICABLE BOXES)

☐ The deadline for filing proofs of claim expired prior to the filing of the claim, so the claim should be disallowed in its entirety. (Not applicable in Chapter 7)

☒ The claim should be disallowed entirely because,

1. Neither Claim 39, nor its Exhibits, demonstrate any financial obligation of Noble Health Real Estate LLC to United States Department of Labor - Wage Hour.

2. Neither Claim 39, nor any of its exhibits, demonstrate any direct agreement between Noble Health Real Estate LLC and United States Department of Labor - Wage Hour.

3. Further, Exhibits of United States Department of Labor - Wage Hour's Claim 39, which have been used to define the basis for the claim's dollar amount, actively assert claims against a Third-Party Defendants, "Noble Health Audrain Community Hospital, and Noble Health Corp".

4. The Third Parties noted in United States Department of Labor - Wage Hour's Claim 39 Exhibits, "Noble Health Audrain Community Hospital, and Noble Health

Corp", has no relation to Noble Health Real Estate LLC.

5. Further, any basis for **United States Department of Labor - Wage Hour's Claim 39**, has been resolved through a settlement with **Jeanette Quinn, individually and on behalf of all those similarly situated.**

6. Debtor, **Noble Health Real Estate LLC**, does not currently, nor has it ever been an employer, nor had employees.

7. As this claim was filed on the basis of subrogation, and has been resolved and settled, **United States Department of Labor - Wage Hour** should be barred from voting in the Acceptance or Rejection of any potential Plan of Reorganization and any current or previous ballots should be stricken from the tally.

- ☐ The claim should instead be allowed as a (secured, priority, or unsecured) claim in the amount of \$Enter amount because Enter reason.
- ☐ The claim should instead be allowed as secured in the amount of \$Enter amount and unsecured in the amount of \$Enter amount because Enter reason.
- ☐ Other Enter text:

Dated: 8/1/2024

/s/ Ronald S. Weiss
Attorney
1100 Main St., Ste. 2850
Kansas City, MO 64105

CERTIFICATE OF SERVICE

I, **Ronald S. Weiss** , hereby certify that a true and correct copy of the Objection to Claim was mailed to (affected creditors/unrepresented parties requesting notice) by first class mail this 1st day of August, 2024.

United States Department of Labor – Wage & Hour
2300 Main Street, Ste 10100
Kansas City, MO 64108

Represented parties received notice electronically via the court's Electronic System.

Dated: 8/1/2024

/s/ Ronald S. Weiss
Typed Name or Signature

Court address: U.S. Bankruptcy Court, 400 E. 9th St., Room 1510, Kansas City, MO 64106
Instructions: Complete all parts of the form and serve on the affected parties

ECF Event: Bankruptcy>Claim Actions>Objection to Claim (includes 30-day notice)